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October 27, 2020

VIA ECF

Hon. Paul A. Engelmayer
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 2201
New York, NY 10007

Re: Goat Fashion Limited v. 1661, Inc., Case No. 19 Civ. 11045 (PAE)

Dear Judge Engelmayer:

This letter is submitted on behalf of Defendant 1661, Inc. (“1661”) in the above-referenced action. 1661 respectfully requests leave to re-file its Reply in Support of Its Motion for Stay Pending Appeal (ECF Nos. 113, 115) (“Stay Reply”) to redact references to information designated as confidential by Plaintiff Goat Fashion Limited (“Goat Fashion”).

On page 3 of the Stay Reply, 1661 cited Exhibit 113 to the Declaration of Rebecca Wakeling Benning and included two parenthetical notations describing the exhibit. *See* Stay Reply at 3 (citing ECF No. 47-4, at 19, 23). Initially, Goat Fashion filed Exhibit 113 as a publicly available document at ECF No. 47-4. But Goat Fashion subsequently moved to file Exhibit 113 under seal, asserting that it contained information designated as “Confidential pursuant to the parties’ Stipulated Confidentiality Agreement and Protective Order.” ECF No. 50. The Court granted Goat Fashion’s motion, ECF No. 53, and Exhibit 113 is now located on the docket under seal at ECF No. 55-4.

In the Stay Reply, 1661 inadvertently referenced Exhibit 113 in its original, publicly available form, citing its original docket entry number (“ECF No. 47-4”) and leaving the information describing the exhibit unredacted. To ensure compliance with the parties’ stipulated protective order, 1661 is submitting a corrected version of the Stay Reply that (i) corrects the citation on page 3 for Exhibit 113 to “ECF No. 55-4”; and (ii) redacts the information discussing Exhibit 113. The document contains no other changes.

Accordingly, 1661 requests that the Court grant 1661 leave to file the accompanying corrected Stay Reply and remove ECF Nos. 113 and 115 from the docket.

October 27, 2020
Page 2

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Respectfully Submitted,

/s/ Jennifer L. Barry
Jennifer L. Barry (*pro hac vice*)
of LATHAM & WATKINS LLP

Attorney for Defendant 1661, Inc.

cc: All counsel of record (via ECF)

Granted.

SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge

October 28, 2020